

## REMARKS

In the Office Action dated March 6, 2003, the Examiner rejected all of the pending claims under 35 U.S.C. § 102(e) as being anticipated by *Goldman et al.* (U.S. Patent No. 6,134,235). Applicants respectfully submit that *Goldman et al.* does not anticipate the presently claimed invention for the reasons given below.

*Goldman et al.* disclose a system and method for bridging the POTS network and a packet network, such as the Internet, using a set of access objects that provide the interfacing and functionality for exchanging address and payload information with the packet network, and for exchanging payload information with the payload subnetwork and signaling information with the signaling subnetwork of the POTS network. The system and method disclosed by *Goldman et al.*, however, do not distinguish between voice and data payloads. Instead, in the system and method of *Goldman et al.*, all payload traffic (regardless of whether such payload traffic contains voice or data information) is routed between the POTS network and the packet network via a single common POTS/packet bridge. *See, e.g.*, FIG. 1 of the *Goldman et al.* reference.

In contrast, the presently claimed invention recites a method and system architecture for a central office that utilizes separate devices (i.e., telephony gateway and remote access server) and pathways to convert voice and data (e.g., modem) signals/calls into IP packets (and vice versa). In the presently claimed invention, the central office switch differentiates between voice and data calls, and routes such calls to the appropriate conversion device (i.e., telephony gateway and remote access server) based on whether the calls contain voice or data information. Consequently, *Goldman et al.* and their single common POTS/packet bridge do not anticipate the presently claimed invention, and Applicants respectfully request that the Examiner withdraw the

rejection of the claims under 35 U.S.C. § 102. Applicants also believe the present claims to be in condition for allowance, and earnestly request early notification of same.

If, for any reason, the Examiner is unable to allow the application on the basis of this amendment and feels that a telephone conference would help clear up any unresolved matters, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,  
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